

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

In re: Shale Oil Antitrust Litigation

This Document Relates to:

No. 1:24-md-03119-MLG-LF

ALL ACTIONS

PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiffs, by and through undersigned counsel, submit this Supplemental Authority in light of the inquiries the Court made at the May 20, 2025 Hearing on Defendants' Motions to Dismiss:

1. *Leibovitch v. Islamic Republic of Iran*, 297 F. Supp. 3d 816 (N.D. Ill. 2018). (Exhibit 1)(the political question doctrine does not bar the court from resolving the parties' discovery dispute).
2. *World Wide Mins. Ltd. v. Republic of Kazakhstan*, 116 F. Supp. 2d 98, 102-105 (D.D.C. 2000), *aff'd and remanded on other grounds*, 296 F.3d 1154 (D.C. Cir. 2002). (Exhibit 2)(While Plaintiffs' claims against a foreign country was barred by the state action doctrine, claims against private company that entered into an agreement with the foreign country was not barred by state action doctrine.)

Dated: May 27, 2025

By: /s/ Karin B. Swope

Karin B. Swope (*pro hac vice*)
Thomas E. Loeser (*pro hac vice*)
Vara G. Lyons (*pro hac vice*)
Ellen J Wen (*pro hac vice*)
Jacob M. Alhadeff (*pro hac vice*)
COTCHETT, PITRE, & McCARTHY, LLP
1809 7th Avenue, Suite 1610
Seattle, WA 98103
Tel: (206) 778-2123
kswope@cpmlegal.com
tloeser@cpmlegal.com
vlyons@cpmlegal.com
ewen@cpmlegal.com
jalhadeff@cpmlegal.com

Joseph W. Cotchett (*pro hac vice*)
Adam Zapala (*pro hac vice*)
Vasti S. Montiel (*pro hac vice*)
840 Malcolm Road
Burlingame, CA 94010
Tel: (650) 697-6000
jcotchett@cpmlegal.com
azapala@cpmlegal.com
vmoniel@cpmlegal.com

Michael Dell'Angelo (*pro hac vice*)
Michael J. Kane (*pro hac vice*)
Candice Enders (*pro hac vice*)
BERGER MONTAGUE PC
1818 Market Street
Suite 3600
Philadelphia, PA 19103
Tel: (215) 875-3080
mdellangelo@bm.net

Richard D. Schwartz (*pro hac vice*)
BERGER MONTAGUE PC
1720 W. Division
Chicago, IL 20622
Tel: (773) 257-0255
rschwartz@bm.net

Christopher A. Dodd
DODD LAW OFFICE, LLC
500 Marquette Avenue NW, Suite 1330
Albuquerque, NM 87102
Tel: (505) 475-2932
chris@doddnm.com

Interim Liaison Counsel for Plaintiffs and Putative Class

Patrick J. Coughlin (*pro hac vice*)
Carmen Medici (*pro hac vice*)
Daniel J. Brockwell (*pro hac vice*)
Isabella De Lisi (*pro hac vice*)
SCOTT+SCOTT ATTORNEYS AT LAW LLP
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel: (619) 233-4565
pcoughlin@scott-scott.com
cmedici@scott-scott.com
dbrockwell@scott-scott.com
idelisi@scott-scott.com

Patrick McGahan (*pro hac vice*)
Michael Srodoski (*pro hac vice*)
SCOTT+SCOTT ATTORNEYS AT LAW LLP
156 S Main Street
P.O. Box 192
Colchester, CT 06415
Tel: (860) 537-5537
pmcgahan@scott-scott.com
msrodoski@scott-scott.com

Karin E. Garvey (*pro hac vice*)
SCOTT+SCOTT ATTORNEYS AT LAW LLP
230 Park Ave., 24th Floor
New York, NY 11069
Tel: (212) 223-6444
kgarvey@scott-scott.com

Interim Co-Lead Counsel for Plaintiffs and the Putative Class